

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on November 14, 2006.

Permit Number: **R30-03100030-2006**
Application Received: **October 2, 2008**
Plant Identification Number: **03-54-03100030**
Permittee: **American Woodmark Corporation**
Facility Name: **South Branch Plant**
Mailing Address: **587 Robert C. Byrd Industrial Park Road**

Permit Action Number: *MM02*, Revised: July 31, 2009

Physical Location:	Moorefield, Hardy County, West Virginia
UTM Coordinates:	677.73 km Easting • 4327.129 km Northing • Zone 17
Directions:	From the town of Moorefield at the intersection of Route 28 and Route 55, take Route 55 East (Winchester Ave.) approximately 2.2 miles and turn left onto Robert C. Byrd Industrial Park Road. The plant is approximately 0.5 miles from Route 55 East on Robert C. Byrd Industrial Park Road.

Facility Description

The South Branch Plant manufactures and finishes wood doors and frames for shipment to American Woodmark Corporation facilities across the nation for final assembly into finished kitchen and vanity cabinets. Primary processes include dimensioning of kiln-dried wood; assembly of parts to create either doors or frames; and finishing of doors, frames and miscellaneous parts. The facility operates under SIC code 2432.

The purpose of this modification is to install two (2) spray paint booths. The Title V minor modification includes these changes approved under R13-2571J, issued, December 2, 2008

AWCSB will install two (2) spray paint booths, which will operate under one of two scenarios; use water based coatings or vent to RTOs in order to minimize emissions. The position of the booths in the process line has not yet been determined. This application is also to modify, simply, and standardize how the plant is defined in the permit.

Emissions Summary

This minor modification results in the following potential to emit (PTE) increases:

PM10	VOC
+0.67 TPY	+0.13 TPY

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 249 tons per year VOCs, 26.01 tons per year of xylene, 32.13 tons per year of toluene, and 70.35 tons per year of aggregate HAP's. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, American Woodmark Corporation's South Branch Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Preconstruction permits for minor sources
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2571J	December 2, 2008	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently

enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

American Woodmark Corporation's South Branch Plant (AWCSB) has received two (2) spray paint booths from American Woodmark Corporation's Ham Lake Plant. The South Branch Plant had no immediate plans to add spray paint booths to its production line. This permit application addresses two (2) potential methods to use the booths as they may be needed. One scenario uses the same materials currently being used and venting the booth or booths to the existing Recuperative Thermal Oxidizers (RTO). The second would be to use water based paints. Water based paints contain no VOCs but would result in slightly higher PM emissions. The potential to emit calculated in this permit application takes the higher emission rate of the two (2) scenarios and uses it for both booths. However, AWCSB is not seeking an increase to the VOC emissions limit for the RTOs. The existing limit will be complied with and confirmed with measures already in place.

The permit also changes the emission limits from the UV ovens from a per oven basis to a cumulative basis and makes other minor language changes.

The following changes were incorporated in Title V permit due to this modification:

1. Last two rows are added in Section 1.1 to include these two spray booths.
2. Old condition 6.1.5 was changed to better define the points of the pressure difference and specify a three hour rolling average.
3. Old conditions 9.1.1 and 9.1.2 were merged to specify a cumulative emission limit instead of a per oven emission limit. New condition 9.1.1 was added.
4. Condition 3.4.11 was changed to reflect the new condition numbering.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Beena Modi
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.